

EXHIBIT 197

Standard Operating Procedure

Document Version 1.4

<u>HBC Service Co. – Washington, PA</u>	
<u>Pharmacy Hand-Off to Courier</u>	EFFECTIVE DATE: 05/12/11
	FILE NAME: SOP Pharmacy Hand-Off to Courier 1.0
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1.0 PURPOSE

- 1.1 The following procedure applies to the Pharmacy Hand-Off to Courier transporting HBC Rx to McKesson.

2.0 TOOLS and EQUIPMENT

- 2.1 The following list details all tools and equipment for the Pharmacy Hand-Off to Courier process.
- 2.2 Bill of Lading – Details how many totes and for what stores are on the selected outbound pallets. 3 copies of each of the 5 routes (15 pages total) should be printed, 1 – HBC in-house copy, 2 – courier's copy, 3 – McKesson copy.
- 2.3 Pen – to have courier driver sign in-house copy to verify that the product count is correct.

3.0 PROCEDURE

- 3.1 Courier arrives at HBC pharmacy to pick up selected pallets of totes to be shipped to McKesson.
- 3.2 Supervisor locks truck into Door 50 with trailer restraint, puts plate into trailer and lets the driver into the building.
- 3.3 Supervisor provides 3 copies of BOL to courier driver.
- 3.4 Pallets are brought from pharmacy room to Door 50 by HBC TM.

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- 3.5 Prior to loading each pallets totes are counted to verify that the correct amount of totes for that route are on the pallet.
- 3.6 If there are any discrepancies:
 - 3.6.1 Totes are counted again
 - 3.6.2 If discrepancy still exists, the pallet is set to the side until other pallets are loaded. Totes may have been placed on another routes pallet.
 - 3.6.3 If pallet count does not equal after all pallets have been loaded, a check of the pharmacy room is completed to see if the missing tote(s) were not palletized.
 - 3.6.4 If pallet count does not equal check Route sheet to make sure that it was correctly filled out.
 - 3.6.5 If totes cannot be found in pharmacy room, BOL must be noted that there was a discrepancy with the HBC BOL count and the actual count at the point of loading. This must be noted on all 3 BOL's.
 - 3.6.6 An email must be generated and sent by the pharmacy support staff indicating that there was a discrepancy. Must go to building manager, Shift managers, and Greg Carlson.
- 3.7 BOL's, all 3 copies, are signed by HBC supervisor and the courier driver.
- 3.8 Courier's trailer door is sealed with a numbered seal or locked with a padlock before leaving Door 50.
- 3.9 Door 50's trailer restraint is unlocked and the courier is walked and let out of the man door.